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22nd April 2020
PRE/20/115235

Dear Mr Atkins,

Pre application concept enquiry: Willow Way, SE23

I refer to your pre-application enquiry for the above site, and the subsequent concept meeting on 31st January 2020 that was attended by Geoff Whittington (Senior Planning officer), James Hughes (Development Management Team Leader – South Area), Erik Nilsen (Principal Policy officer), and Jennifer Rivers (Surveyor, Regeneration and Place).

You have submitted the following:

- Willow Way Masterplan [Pre-application Document, October 2019]

Whilst the concept meeting was intended to provide advice in relation to the principle of reconfiguring the existing property, some discussion was held in regard to external alterations, and highways matters.

Site Description

The pre-application site is located within the Willow Way Local Employment Location (LEL), allocated in the Lewisham Core Strategy (2011).

The site currently accommodates various employment uses including business, light industrial, general industrial and storage and distribution uses (B1, B2, B8 and Sui Generis use classes).

A large section of the site is currently vacant having previously been used as a temporary school. All existing buildings on site are single-storey or low rise. The immediate surrounding context is largely commercial, with some accommodating upper floor residential units.

The estate is formed of two parcels in separate ownership. The eastern parcel is owned by Tranquil Homes, and is currently occupied by light industrial units with ancillary offices, and one car repair garage with ancillary residential accommodation above.

The southern part of the western parcel is owned by LB Lewisham, and was previously in use as a vehicle depot. In recent years, it has been let on a short lease basis, however it is currently vacant.

Further to the north of the site are various uses, and you have advised that Tranquil Homes are seeking to secure options for this element.

The pre-application site has a Public Transport Accessibility Level (PTAL) of 4, which indicates good access to public transport.

Proposal

The scheme incorporates a master planned approach for the site, which would include a comprehensive redevelopment of the estate to provide a mixed use of B1(a) offices and upper floor residential units.

Your submission sets out that the proposal would provide more than 100 residential units within the estate. Commercial areas would be created in clusters by relevant use.

New green links and public realms spaces would be designed and reinforced as a principle of the development.

A shared surface between pedestrians and vehicles would be provided within the site, with on-street parking only.

A semi-public space for small children's play and communal gathering would be accessible for future residents and the wider public.

The proposal does not include the Willow Way Business Park to the south of the estate.

Principle of Internal Reconfiguration Works.

The purpose of this report is to address the principle of redeveloping the site only. Other matters, including design, will not be addressed at this stage, given the concept nature of the proposal.

The site falls within the Local Employment Locations (LEL) designation. Core Strategy Policy 3 states that the Council will protect the Local Employment Locations (LELs) for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and also appropriate sui generis uses, to support the functioning of the local economy.

DM Policy 10 of the adopted Development Management Local Plan (2014) states that the Council will support uses within the B use class and appropriate sui generis uses, subject to:

- a) the use being appropriate in the location in relation to the surrounding built context;
- b) the intensity of the use; and
- c) the new use meeting the aims in the Core Strategy Policy 3.

DM Policy 10 also states that planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the

proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.

Furthermore, the Lewisham Employment Land Study (2015) currently states the following with regard to Local Employment Land sites:

“The vast majority of sites within the borough’s suite of LELs form well-functioning industrial/warehousing areas, with low observed levels of vacancy, generally good quality buildings and environment and having little to no impact on neighbouring sensitive uses where these are present. Although the LELs do contain some office (B1a/b) employment space and non-B sector occupiers, these do not in the majority of instances conflict with the mostly industrial nature of the clusters, and instead bolster the employment generating potential of these areas and provide more varied local job opportunities. There is thus good justification for retaining the designation of the LELs through the planning period”.

Recommendation R3 of the same document states that the Willow Way LEL should continue to be protected for employment land uses to help ensure that there is sufficient capacity to meet the projected demand for industrial/warehousing land and floorspace in LB Lewisham to 2033.

As you are aware, the emerging Lewisham local plan is currently at a premature level. The Draft Lewisham Local Plan was presented to Lewisham’s Mayor and Cabinet on 11th March 2020 at Regulation 18 stage. The Plan is still programmed to be considered at a full meeting of Council on 15th July 2020. Subject to approval of the Council, public consultation at Regulation 18 stage will proceed as programmed.

The following milestones are programmed in terms of local plan production. Officers will continue to update applicants and stakeholders as to the impact of COVID-19 on local plan production. Officers are also working to ensure the emerging Local Plan is consistent with any alterations to the draft London Plan required by the Secretary of State.

Preparing the Draft Local Plan / reviewing responses from call for sites and preparing technical evidence bases, including through engagement with communities and stakeholders (e.g. New Cross Area Framework, Catford Masterplan, Characterisation Study)	Autumn 2018 – Spring 2020
Draft Local Plan (Regulation 18 consultation)	Summer/Autumn 2020
Publication of the Local Plan for Submission (Regulation 19 consultation)	Winter/Spring 2020/2021
Submission to the Secretary of State (Regulation 22 submission)	Summer/Autumn 2021
Examination by a Planning Inspector	Autumn/Winter 2021
Adoption by Full council	2022

As part of the emerging local plan process Lewisham undertook an Employment Land Study in March 2019. This assessment applied market tests to currently designated employment sites and considered their suitability to be safeguarded,

intensified or masterplanned for employment uses. The review generally concluded that there was strong demand and limited supply for sites in Lewisham's commercial market, and no assessed employment sites in the borough should be entirely released for alternative uses in the emerging plan.

However the ELS identified that a number of sites could be either intensified or masterplanned to ensure that some redevelopment can take place, but ultimately this re-development could not be at the expense of employment uses. Willow Way LEL (C20) is identified as an employment area where an employment-led mixed-use redevelopment (through a masterplan process) could occur.

It is important to note the ELS is not adopted policy and the site specific recommendations in the ELS are intended to be considered through the plan-led process and where appropriate, progressed through the local plan.

The applicant should therefore ensure they are monitoring the progress of the emerging local plan and any planning application for employment-led mixed-use redevelopment should be programmed to realistically align with the milestones above. This will allow officers the opportunity to accord sufficient weight to emerging policy supporting co-location of uses within the LEL. Provision of mixed use development must be comprehensive and make a genuine commitment to employment-led redevelopment. The existing amount of employment floorspace should be protected to ensure that demand in the area is met over the emerging local plan period. The submitted master plan document provides a high level design rational but does not sufficiently engage with existing and proposed employment floorspace quantum to allow for a concept level assessment.

Therefore while officers welcome the principle of future redevelopment, the current Local Plan must be adhered to until the emerging local plan is sufficiently progressed. Should an application come forward at an appropriate juncture for employment-led mixed-use redevelopment that is master-planned, strategic release is likely to be acceptable in principle provided the scheme makes a high quality and commensurate re-provision and is sufficiently employment-led.

Moving Forward

Subject to the agreed direction of the emerging Local Plan, the redevelopment of the Willow Way LEL would require the undertaking of a comprehensive masterplan, which should focus on the physical relationship between the intended mix of uses, and placemaking.

It would assist officers if a comprehensive assessment of current uses and floorspace is provided with a future detailed pre-application request. The 2019 ELS provides an assessment of the current quantum and quality of provision within the Willow Way LEL. An evidenced based survey that adds to this assessment would allow for a full review of the existing position and establish a baseline for re-provision. The applicant should also give early thought to a re-location and retention strategy for existing users where applicable.

Conclusion

The proposed comprehensive mixed-use development of the Willow Way estate including employment and residential provision would not be in compliance with the adopted Development Plan, which seeks to avoid any development that would dilute the functioning of the designated LEL sites.

The current LEL designation is intended to protect locally important clusters of industrial buildings that have uses mainly within the B Use Class. The Council considers the emerging policy position is likely to allow strategy release and re-development to a timescale that accords with emerging local plan production. The applicant is invited to progress the pre-application process to a detailed level to address specific planning issues around layout, design and access, but an application should not be made until the local plan is sufficiently emerged.

I trust that this letter sets out the current position of the Council in respect of your proposals.

If the applicant is of the view the proposal may exceed the thresholds for referral to the Greater London Authority, a pre-application with the GLA should be sought. Lewisham would welcome the opportunity to attend this session. While not a concept level issue, given the possible highways alterations proposed, a pre-application with highways colleagues is strongly recommended. Officers understand the applicant continues to engage with regeneration colleagues regarding Council owned land.

Please be aware that the content of this letter is sent without prejudice to the recommendation or final decision on any application submitted.

The officer dealing with your application is Geoff Whittington, who can be contacted on 020 8314 9530 should you wish to discuss any queries. Please quote PRE/20/115235 when contacting this office.

Yours sincerely

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